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15 Attorneys for Defendant  
16 LUKE D. BRUGNARA

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA

19  
20 UNITED STATES OF AMERICA, ) CR-14-00306-WHA  
21 Plaintiff, ) DEFENDANT'S MOTION TO FILE  
22 v. ) UNDER SEAL THE EXHIBITS  
23 LUKE D. BRUGNARA, ) TO THE DECLARATION OF  
24 Defendant. ) COUNSEL IN SUPPORT OF  
25 ) DEFENDANT'S SUPPLEMENT  
26 ) TO SENTENCING MEMORANDUM  
27 )  
28 )

29  
30 Defendant, LUKE D. BRUGNARA, by and through his attorneys, George C. Boisseau  
31 and Dena Marie Young, moves the Court, pursuant to Northern District of California Local  
32 Criminal Rule 56-1, to order that the defendant may file under seal copies of the Exhibits to the  
33 Declaration of Counsel in Support of Defendant's Supplement to Sentencing Memorandum.

34 In support of this request to file the exhibits under seal, BRUGNARA's counsel, Dena  
35 Marie Young, makes the following declaration under penalty of perjury:

36 I, Dena Marie Young, am an attorney licensed to practice law in the Northern District of  
37 California and the State of California, and one of the attorneys of record for defendant, LUKE D.  
38 BRUGNARA.

1 On October 1, 2015, we filed a Sentencing Memorandum on behalf of BRUGNARA in  
2 which we mentioned a materials pertaining to a mental health evaluation. The mentioned report  
3 was completed and submitted to counsel a few hours after the Sentencing Memorandum was  
4 filed. It is therefore necessary to supplement our Sentencing Memorandum with the attached  
5 materials.

6 Due to the medical nature of these materials and privacy concerns, this information is  
7 not appropriate for public filing. This is the type of document that is appropriate for filing under  
8 seal under the local rules for the Northern District of California.

9           The materials have been provided separately to the probation officer and to government  
10           counsel.

11 WHEREFORE, defendant respectfully requests this Court to grant this motion to file  
12 under seal.

13 || Dated: October 2, 2015

Respectfully submitted,

/s/  
**DENA MARIE YOUNG**

Attorney for the Defendant  
LUKE D. BRUGNARA

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LUKE D. BRUGNARA

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13 UNITED STATES OF AMERICA, ) CR-14-00306-WHA  
14 Plaintiff, )  
15 v. )  
16 LUKE D. BRUGNARA, )  
17 Defendant. )  
18 )

20 [PROPOSED] ORDER GRANTING DEFENDANT'S  
21 MOTION TO FILE UNDER SEAL

22       Upon motion of defendant, and good cause appearing, IT IS HEREBY ORDERED that  
23 defendant may file under seal copies of the Exhibits to the Declaration of Counsel in Support of  
24 Defendant's Supplement to Sentencing Memorandum.

25 || Dated: October 5, 2015.

Hon. William Alsup  
United States District Judge